
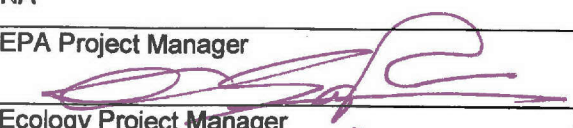


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TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 0719	TPA CHANGE NOTICE FORM	Date: 03/14/2016
Document Number, Title, and Revision: DOE/RL-2014-37, Removal Action Work Plan for 200-DV-1 Operable Unit Perched Water Pumping/Pore Water Extraction, Rev. 0 1232083		Date Document Last Issued: 11/30/2015
Approved Change Notices Against this Document: NA		
Originator: Mark Byrnes		Phone: 373-3996
Description of Change: DOE/RL-2014-37, Rev. 0, is revised to add DOE/RL-2016-22, Waste Management Plan for Perched Water Pumping/Pore Water Extraction, 200-DV-1 Operable Unit, and delete DOE/RL-2012-20, Waste Control Plan for the 200-DV-1 Operable Unit.		
M.W. Cline and D. Goswami agree that the proposed change DOE Lead Regulatory Agency modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, <i>Documentation and Records</i> , and not Chapter 12.0, <i>Changes to the Agreement</i> . Page 21 of DOE/RL-2014-37 is revised to make the following changes: • add DOE/RL-2016-22, Waste Management Plan for Perched Water Pumping/Pore Water Extraction, 200-DV-1 Operable Unit, and delete DOE/RL-2012-20, Waste Control Plan for the 200-DV-1 Operable Unit. Page 29 of DOE/RL-2014-37 is revised to make the following changes: • add DOE/RL-2016-22, Waste Management Plan for Perched Water Pumping/Pore Water Extraction, 200-DV-1 Operable Unit, and delete DOE/RL-2012-20, Waste Control Plan for the 200-DV-1 Operable Unit The revisions to pages 21 and 29 of DOE/RL-2014-37, Rev. 0, are attached. Deleted text is identified by strikethrough . Added text is identified by <u>double underline</u> .		
Note: Include affected page number(s)		
Justification and Impacts of Change: Because perched water pumping/pore water extraction is a removal action in accordance with DOE/RL-2014-34, Action Memorandum for 200-DV-1 Operable Unit Perched Water Pumping/Pore Water Extraction, waste will be managed using a waste management plan.		
Approvals: <div style="display: flex; justify-content: space-between;"> <div>  DOE Project Manager NA </div> <div> 3/17/16 Date </div> <div> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div> <div style="display: flex; justify-content: space-between;"> <div> EPA Project Manager </div> <div> Date </div> <div> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div> <div style="display: flex; justify-content: space-between;"> <div>  Ecology Project Manager </div> <div> 3/17/16 Date </div> <div> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div>		

4 Environmental Management and Controls

This chapter describes the environmental management and controls necessary to conduct this removal action.

4.1 Applicable or Relevant and Appropriate Requirement Compliance

ARARs for this removal action are identified in Appendix A of the AM (DOE/RL-2014-34). The key ARARs include standards for waste management, control of releases to the environment, reporting of nonroutine releases to the environment, and protection of cultural and ecological resources. Influent acceptance criteria for the 200 West P&T were also identified as to be considered (TBC) criteria for this removal action. ARARs and TBC criteria are specified and will be implemented in lower tier work control documents and procedures. Appendix B of this RAWP provides the implementation/action strategy for ARARs and TBCs.

4.2 Waste Management Plan

Several waste streams may be generated from this removal action, such as low-level, dangerous, and mixed waste. Purgewater may also be generated from well pumping, extracting, and/or sampling activities. Waste will be generated at two primary locations: the 200 West P&T, and the perched water extraction well field within the B Tank Farm complex. Waste generated from this removal action will comply with ARARs and TBC criteria. Solid waste generated through implementation of this removal action will be disposed at the Environmental Restoration Disposal Facility (ERDF) in accordance with WCH-191, *Environmental Restoration Disposal Facility Waste Acceptance Criteria*. Waste treatment and/or disposal may take place at other facilities on the Hanford Site or at an offsite facility that has been authorized by respective EPA regional offices in accordance with 40 CFR 300.440, "Procedures for Planning and Implementing Off-Site Response Actions."

In accordance with Section 5.2.3 of the AM (DOE/RL-2014-34), the 200-DV-1 OU perched water pumping/pore water extraction removal action well sites and the ERDF are considered a single site for response purposes.

In accordance with Section 5.2.3 of the AM (DOE/RL-2014-34), the 200-DV-1 OU perched water pumping/pore water extraction removal action well sites and the 200 West P&T are considered to be a single site for response purposes.

Waste generated from the removal action at the well field is considered to be investigation-derived waste and will be managed in accordance with DOE/RL-2016-22, *Waste Management Plan for Perched Water Pumping/Pore Water Extraction* ~~DOE/RL-2012-20, *Waste Control Plan for the 200-DV-1 Operable Unit*~~.

Waste generated from treatment of extracted perched water at the 200 West P&T will be managed in accordance with the waste management plan for the 200 West P&T (Appendix B of DOE/RL-2009-124).

4.3 Standards Controlling Releases to the Environment

For radiological and nonradiological emissions, the air emission plan for 200-DV-1 OU perched water pumping/pore water extraction is provided in Appendix C of this RAWP. The air emissions plan demonstrates compliance with the ARARs identified in WAC 246-247, "Radiation Protection—Air Emissions"; WAC 173-480; WAC 173-400, "General Regulations for Air Pollution Sources"; and WAC 173-460, "Controls for New Sources of Toxic Air Pollutants." The air monitoring plan for the 200 West P&T (Appendix C of DOE/RL-2009-124) provides radiological requirements, criteria/toxic air emissions calculations, and control/monitoring requirements for activities at the 200 West P&T.

- DOE/RL-2009-124, 2015, *200 West Pump and Treat Operations and Maintenance Plan*, Rev. 4, U.S. Department of Energy, Richland Operations Office, Richland, Washington. Available at: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0080208H>.
- DOE/RL-2010-89, 2010, *Long-Range Deep Vadose Zone Program Plan*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington. Available at: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0084131>.
- DOE/RL-2011-40, 2011, *Field Test Plan for the Perched Water Pumping/Pore Water Extraction Treatability Test*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington. Available at: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0093355>.
- DOE/RL-2012-20, 2015, *Waste Control Plan for the 200-DV-1 Operable Unit*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington. Available at: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=1506301062>.
- DOE/RL-2013-37, 2013, *Engineering Evaluation/Cost Analysis for Perched Water Pumping/Pore Water Extraction*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington. Available at: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0086598>.
- DOE/RL-2014-34, 2014, *Action Memorandum for 200-DV-1 Operable Unit Perched Water Pumping/Pore Water Extraction*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington. Available at: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0082284H>.
- DOE/RL-2014-51, 2015, *Sampling and Analysis Plan for 200-DV-1 Operable Unit Perched Water Pumping/Pore Water Extraction*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
- DOE/RL-2016-22, 2016, *Waste Management Plan for Perched Water Pumping/Pore Water Extraction*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
- Ecology, EPA, and DOE, 1989a, *Hanford Federal Facility Agreement and Consent Order*, 2 vols., as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy, Olympia, Washington. Available at: <http://www.hanford.gov/?page=81>.
- Ecology, EPA, and DOE, 1989b, *Hanford Federal Facility Agreement and Consent Order Action Plan*, as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy, Olympia, Washington. Available at: <http://www.hanford.gov/?page=82>.
- EPA, Ecology, and DOE, 2008, *Record of Decision, Hanford 200 Area 200-ZP-1 Superfund Site, Benton County, Washington*, U.S. Environmental Protection Agency, Washington State Department of Ecology, and U.S. Department of Energy, Olympia, Washington. Available at: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=00098825>.
- EPA, Ecology, and DOE, 2012, *Record of Decision for Interim Remedial Action, Hanford 200 Area Superfund Site, 200-UP-1 Operable Unit*, U.S. Environmental Protection Agency, Washington State Department of Ecology, and U.S. Department of Energy, Olympia, Washington. Available at: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0091413>.